



Nuclear Safety Enforcement Trends and Observations

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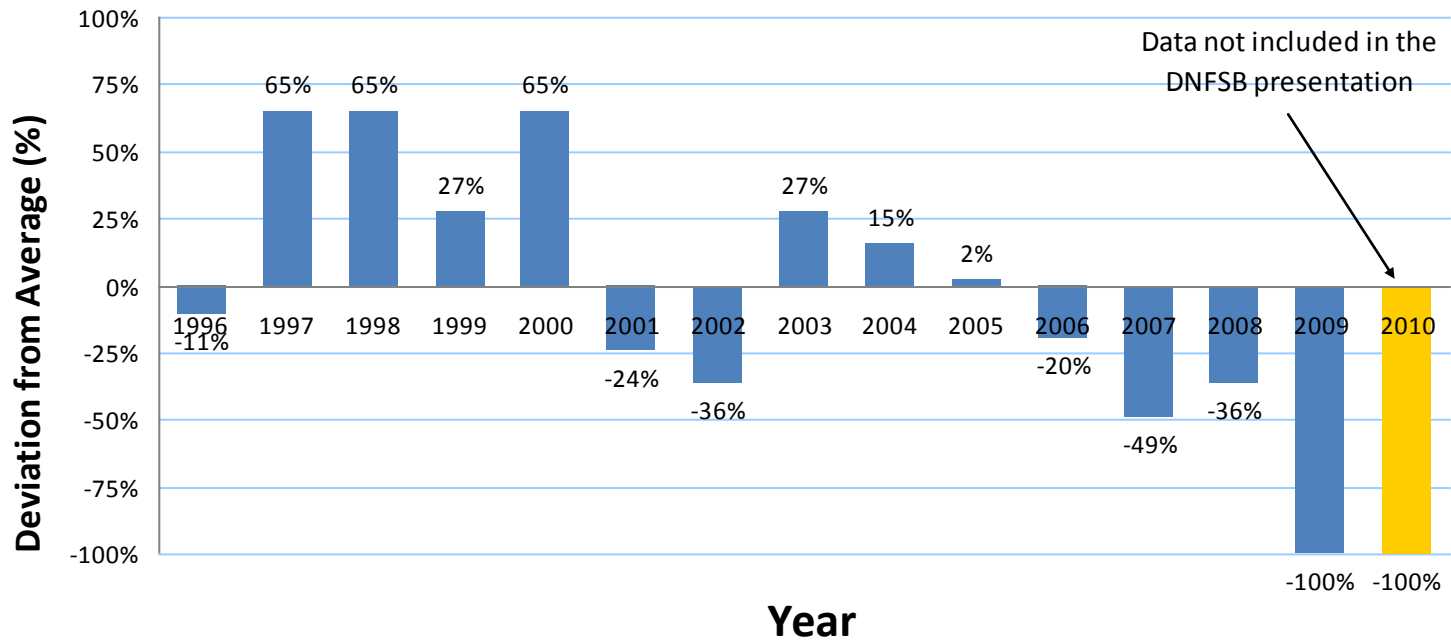


Statement of Concern



Regulatory Enforcement

DOE PAAA Nuclear Safety Notices of Violation





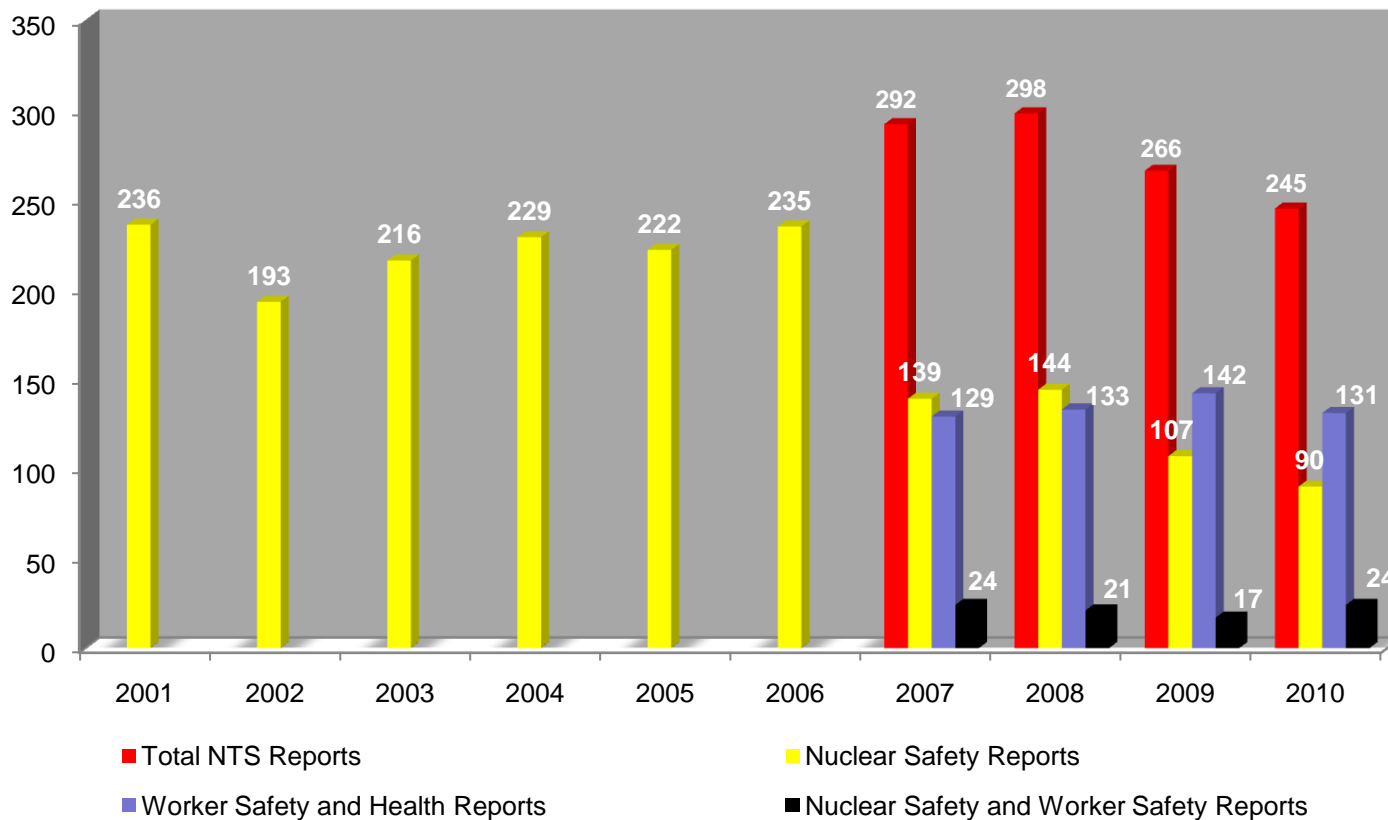
Statement of Concern (cont'd)



- Reduction in Nuclear Safety NTS Reporting
- Reduction in the issuance of NOVs
- Insufficient level of contractor identification of noncompliances



NTS Reporting History





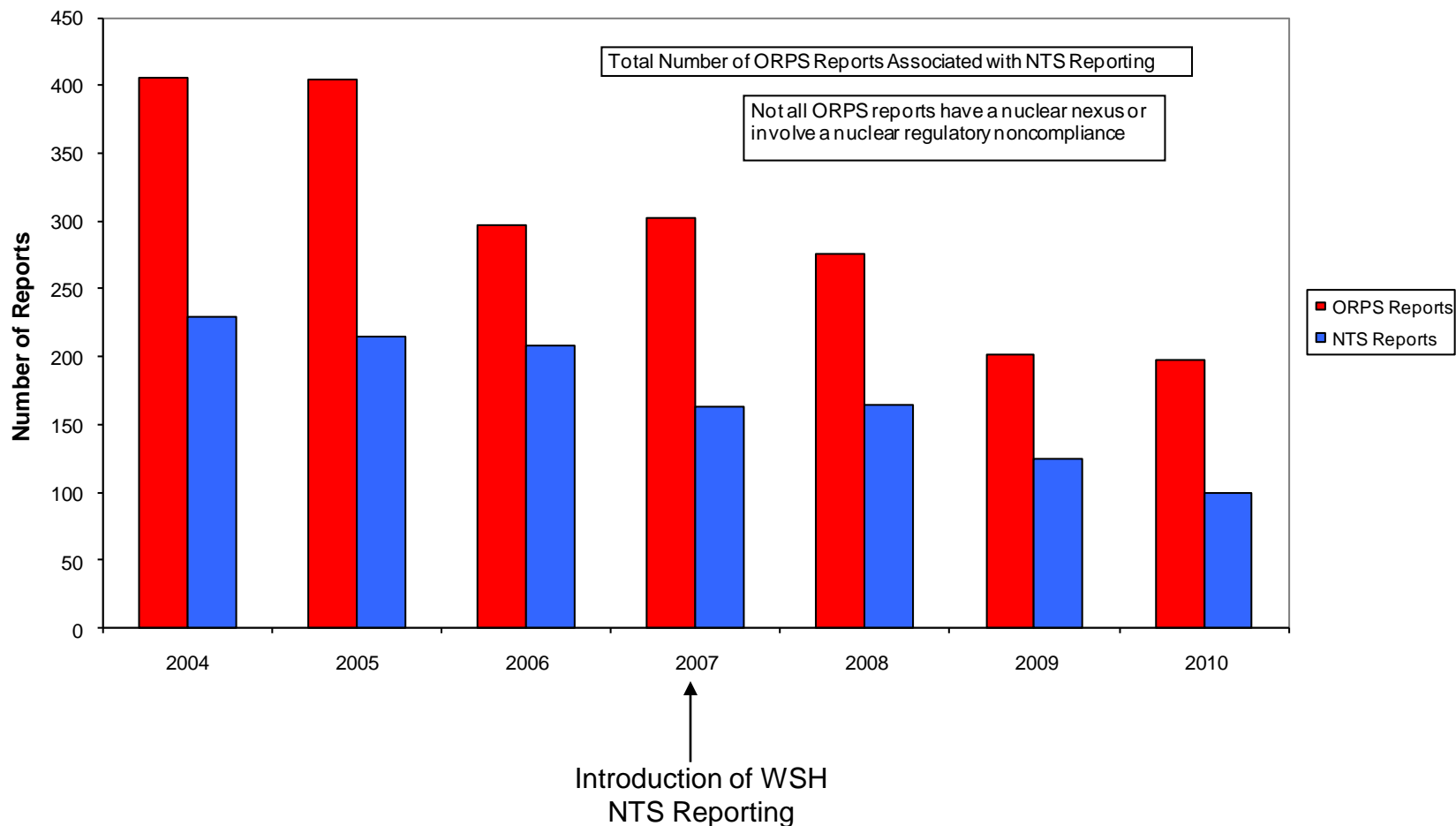
Factors Which May be Influencing Nuclear Safety NTS Reporting



- ORPS reporting
- Reduction in nuclear facility footprint
- Improved nuclear safety performance
- Addition of WSH and Security Enforcement
- Increased reluctance to report
- Others

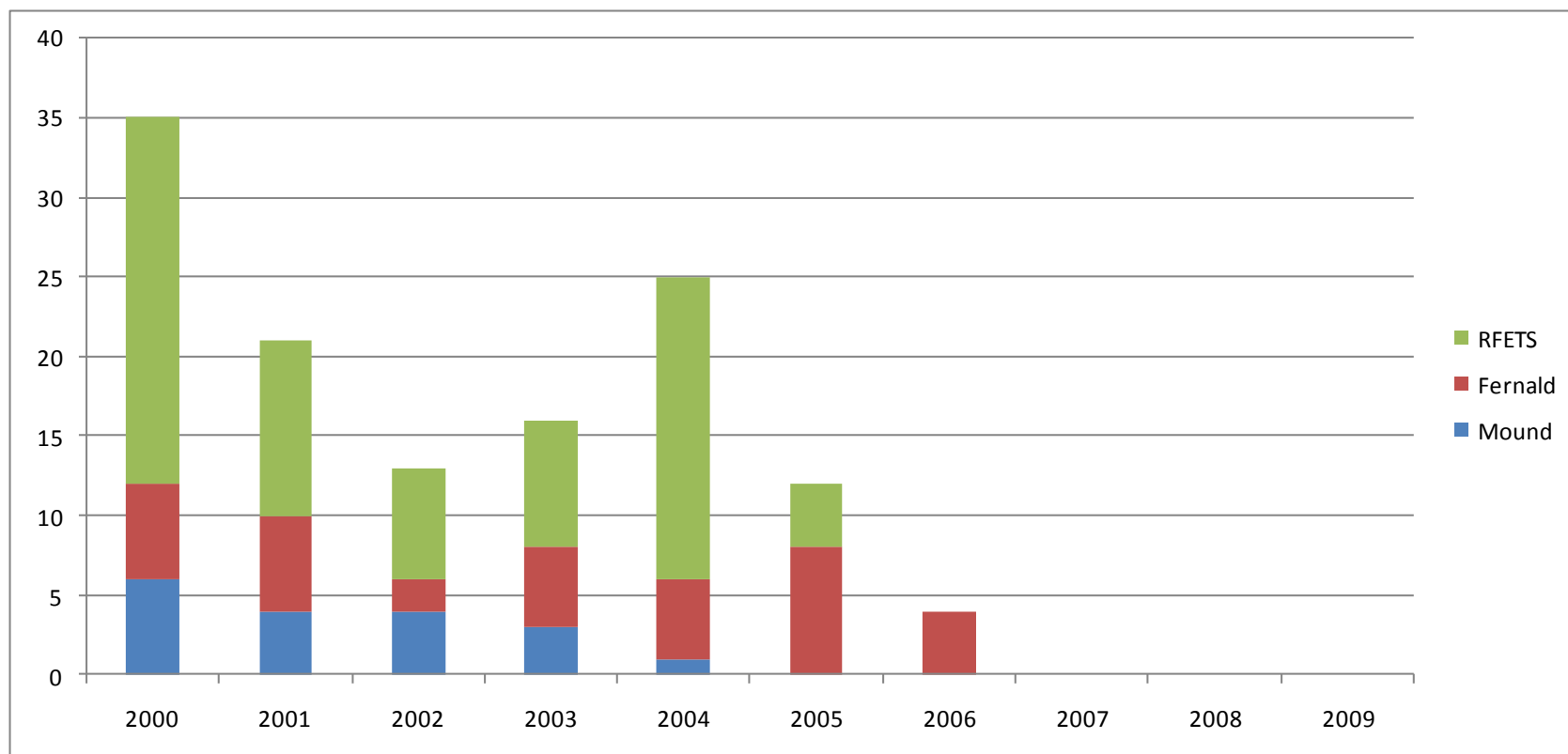


Number of Nuclear Safety ORPS and NTS Reports



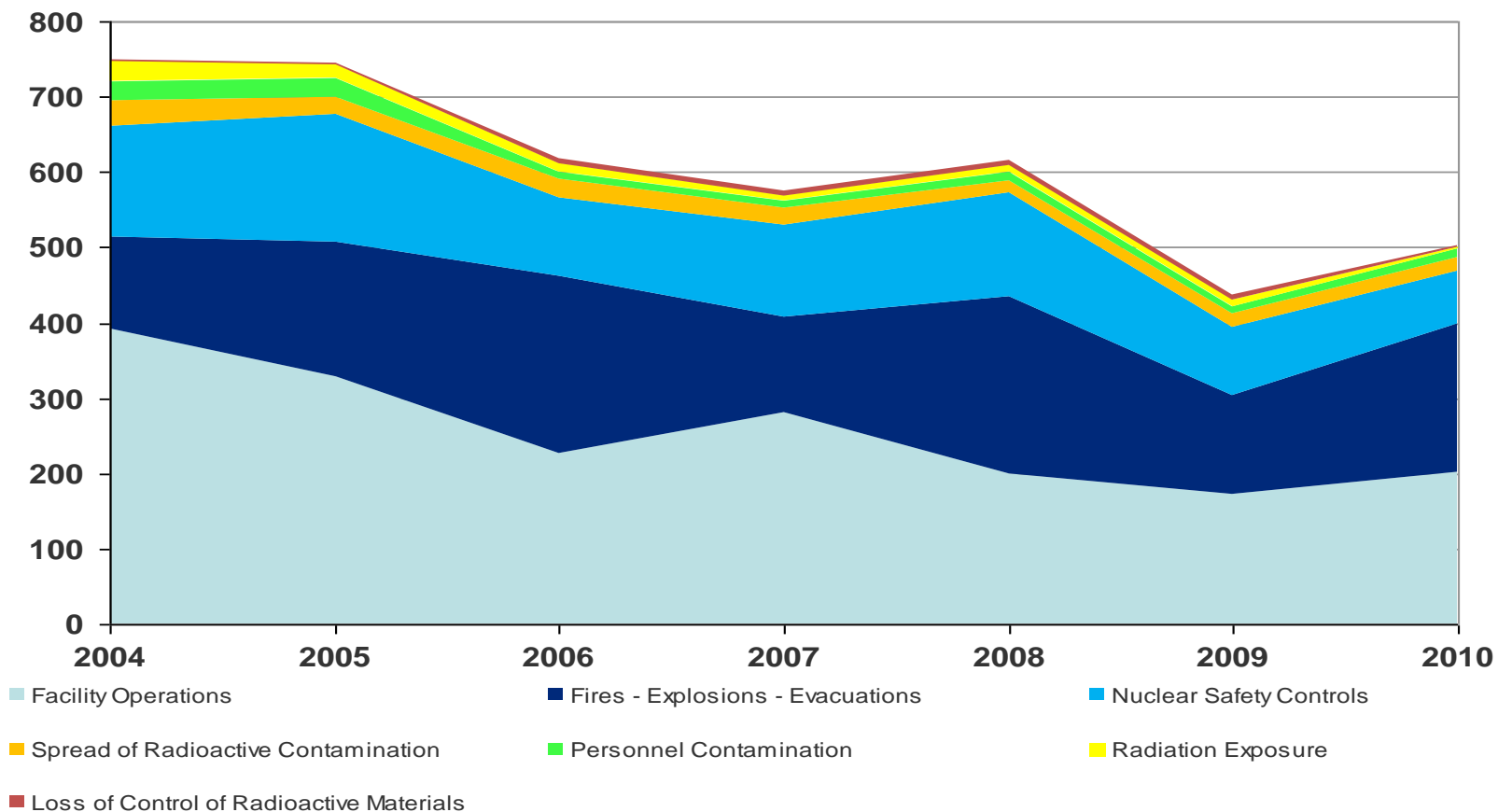


Number of NTS Reports (Nuclear Safety – Mound, Fernald, and Rocky Flats)



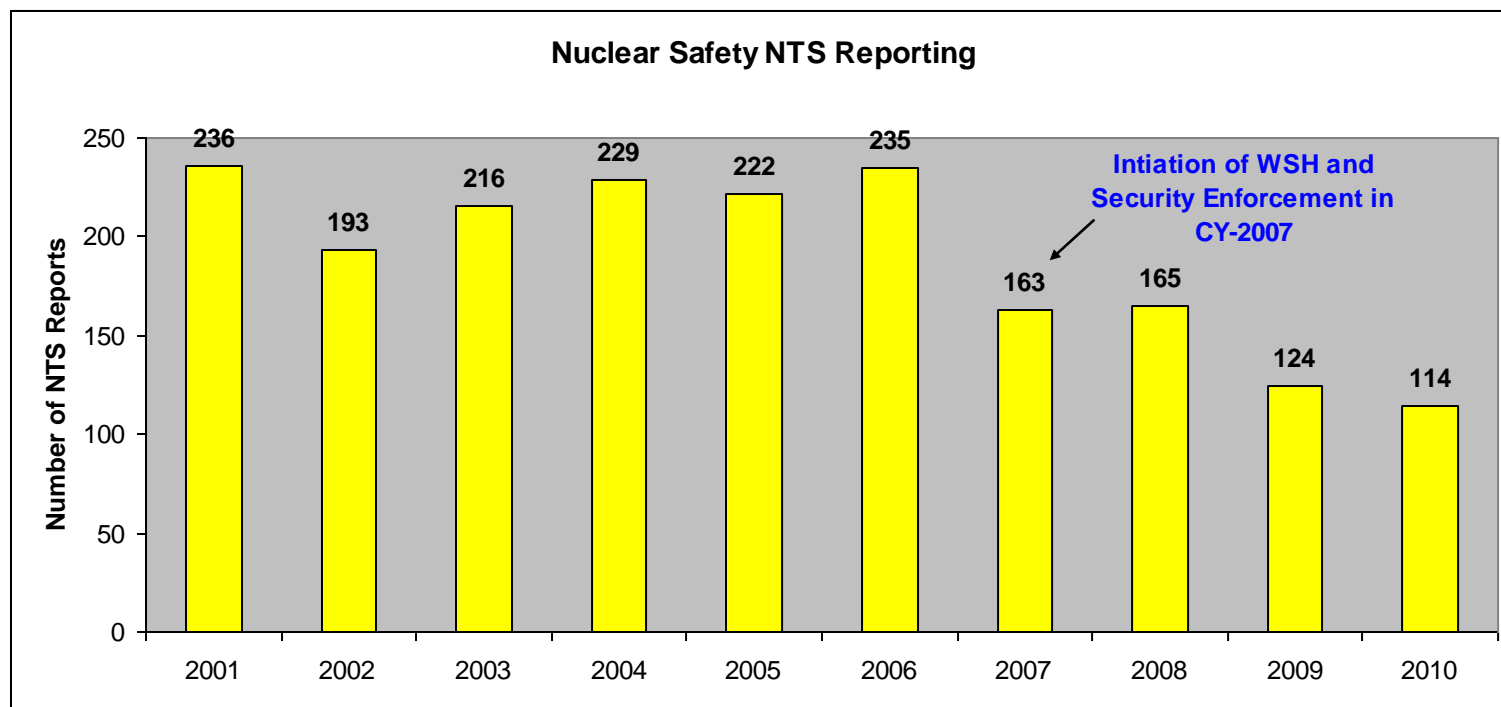


DOE Nuclear Safety Index 2004 - 2010



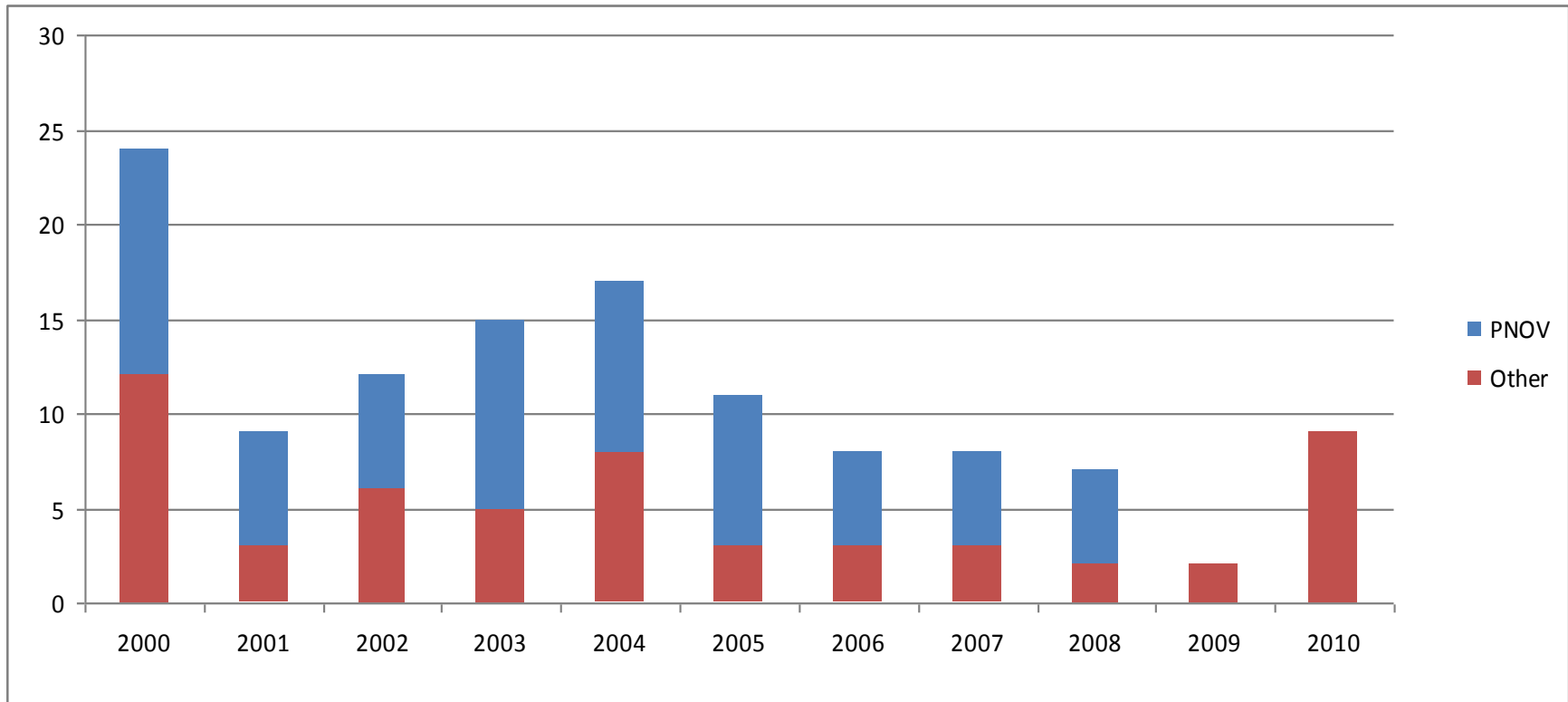


Potential Influence of WSH and Security Enforcement





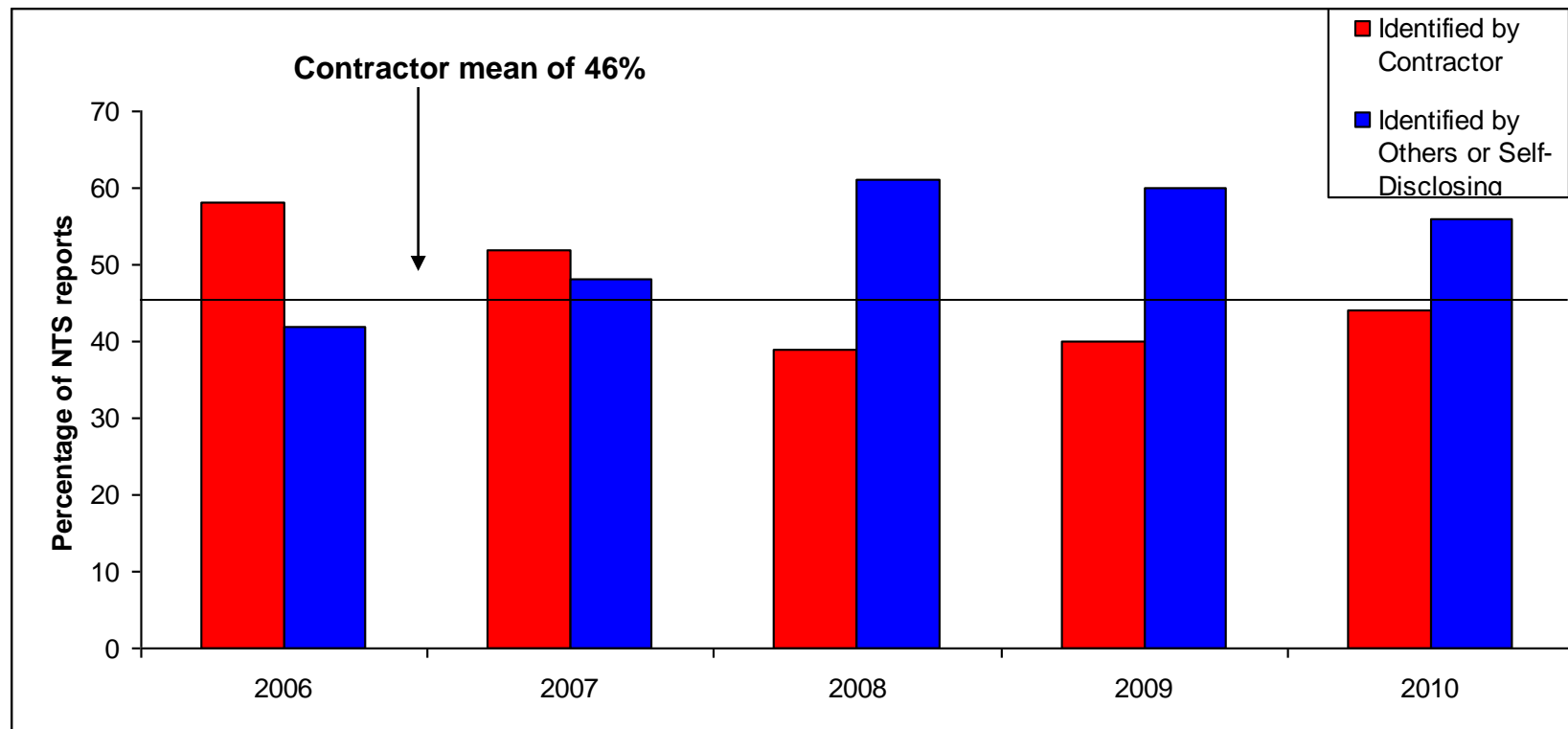
Enforcement Activity (Nuclear Safety)



Actively working 6 cases (4/6/2011)



Noncompliance Mode of Identification





Conclusion



- The reduction in nuclear safety NTS reporting remains a concern
- The Office of Enforcement believes **significant** nuclear safety issues are being surfaced
- Significant nuclear safety issues are being pursued consistent with prior enforcement history
- Enforcement outcomes have shifted with an increased use of consent orders
- All enforcement tools have been, and remain, viable to include NOVs



DNFSB Observation



“This recent drop [issuance of nuclear safety NOVs] sends a strong message to the contractors that DOE is either reducing the importance of nuclear safety or is satisfied with the current level of implementation”